



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality - Part 70 Operating Permit Amendment

Facility Name: West Fraser – Dudley Lumber Mill
Facility Address: 3780 US Highway 80 West
Dudley, Georgia 31022 Laurens County
Mailing Address: P.O. Box 127
Dudley, Georgia 31022
Parent/Holding Company: West Fraser, Inc.
Facility AIRS Number: 04-13- 175-00035

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued an amendment to the Part 70 Operating Permit for:

Require operation of the selective non-catalytic reduction system (ID No. SNCR) to control NO_x emissions from the thermal oil heating system (ID No. TOHS) once the TOHS reaches at least 74 MMBtu/hr heat input (or 50 MMBtu/hr heat output).

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Amendment and Permit No. 2421-175-0035-V-06-0. Unless modified or revoked, this Amendment expires simultaneously with Permit No. 2421-175-0035-V-06-0. This Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in App No. 696401 dated October 10, 2022; any other applications upon which this Amendment or Permit No. 2421-175-0035-V-06-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 6 pages.



DRAFT

Richard E. Dunn, Director
Environmental Protection Division

Table of Contents

PART 1.0	FACILITY DESCRIPTION.....	1
1.3	Process Description of Modification.....	1
PART 3.0	REQUIREMENTS FOR EMISSION UNITS.....	2
3.2	Equipment Emission Caps and Operating Limits	2
PART 5.0	REQUIREMENTS FOR MONITORING (Related to Data Collection)	3
5.2	Specific Monitoring Requirements	4
PART 6.0	OTHER RECORD KEEPING AND REPORTING REQUIREMENTS	5
6.1	General Record Keeping and Reporting Requirements	5

PART 1.0 FACILITY DESCRIPTION

1.3 Process Description of Modification

This permit establishes a thermal oil heater system (ID No. TOHS) operating set point of 74 MMBtu/hr heat input (or 50 MMBtu/hr heat output) for operation of the selective non-catalytic reduction system (SNCR) for control of NOx emissions.

PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.2 Equipment Emission Caps and Operating Limits

Modified Condition

3.2.6 The Permittee shall operate the selective non-catalytic reduction system (ID No. SNCR) when the thermal oil heater system (ID No. TOHS) is operating above 74 MMBtu/hr heat input (or 50 MMBtu/hr heat output). When the TOHS is above 74 MMBtu/hr heat input, as demonstrated by heat output exceeding 50 MMBtu/hr, the Permittee shall operate the SNCR at or above the urea injection ratio factor established in accordance with the most recent Division approved performance test.

[NO_x PSD Avoidance – 40 CFR 52.21]

PART 4.0 REQUIREMENTS FOR TESTING

4.2 Specific Testing Requirements

Modified Condition

4.2.11 [DELETED]

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)

5.2 Specific Monitoring RequirementsModified Condition

- 5.2.2 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the urea injection rate to the selective non-catalytic reduction system (ID No. SNCR) when the TOHS is operating at a level requiring SNCR operation as established during the most recent Division approved performance test. Where such performance specification(s) exist, the system shall meet the applicable performance specification(s) of the Division's monitoring requirements.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

Modified Condition

- 5.2.3 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of the indicated parameters on the following equipment. Data shall be recorded at the frequency specified below. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- a. A device for the measurement of total secondary voltage (kilovolts) of each field of the electrostatic precipitator (ID No. ESP). Such device shall have a required accuracy of approximately 2%. Data shall be recorded hourly when the thermal oil heater system (ID No. TOHS) is in operation.
 - b. A device for the measurement of total secondary current (milliamps) of each field of the electrostatic precipitator (ID No. ESP). Such device shall have a required accuracy of approximately 2%. Data shall be recorded hourly when the thermal oil heater system (ID No. TOHS) is in operation.
 - c. A device for the measurement of pressure drop across the cyclofilter (ID No. PM). Data shall be recorded weekly.
 - d. **Heat input (or heat output) of the TOHS (ID No. TOHS). Data shall be recorded hourly when the TOHS is in operation.**

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS**6.1 General Record Keeping and Reporting Requirements**Modified Condition

- 6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)
 - i. Any six-minute average opacity, as recorded by the COMS specified in Condition 5.2.5, that exceeds 20 percent, except that one six-minute average per hour of up to 27 percent need be reported.
[40 CFR 60.49b(h)(1) and (3)]
 - b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)
 - i. Any rolling 12-month total of Total GHG emissions, determined in accordance with Condition 6.2.3, from the thermal oil heater system (ID No. TOHS), exceeding 126,500 tons CO₂(e).
 - ii. Any time any of the energy efficiency options specified in Condition 3.2.3d. is not complied with.
 - iii. Any twelve consecutive month period for which the total amount of lumber dried in the continuous drying kilns (ID Nos. CDK-1 and CDK-2), combined, exceeds 300 million board feet.
 - iv. Any time the control devices specified in Conditions 3.2.6 through 3.2.8 were not operated in accordance with the requirements specified in these conditions.
 - v. Any time that the fuel burned in the thermal oil heater system (ID No. TOHS) does not meet the requirements specified in Condition 3.2.9.

Title V Permit Amendment

- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)
 - i. Any three-hour period during which the average urea injection ratio is less than ninety (90) percent of the average urea injection ratio factor (in lb urea/MMBtu) established **during the most recent Division approved performance test. The requirements of this Condition apply in accordance with Condition 3.2.6.**
 - ii. Any three-hour average total secondary power input to the electrostatic precipitator (ID No. ESP), recorded in accordance with Condition 5.2.4, that indicates that, except during the startup and shutdown of the thermal oil heater system (ID No. TOHS), ESP is not operated during operation of TOHS.
 - iii. Any weekly measurements of pressure drop across the cyclofilter (ID No. PM) is outside the manufacturer's recommended range.
 - iv. Any adverse condition(s) discovered by the weekly inspections specified in Condition 5.2.1.
 - v. Any time the power vents of the continuous drying kilns (ID Nos. CDK-1 and CDK-2) are not operated while the associated kiln is in operation.
 - vi. Any daily block COMS average opacity, recorded in accordance with Condition 5.2.7h., that is greater than the opacity operating limits specified in Condition 3.3.5d.
[40 CFR 63.7540(a)(1) and 40 CFR 63.7540(b)]
 - vii. Any 30-day rolling average boiler operating load, recorded in accordance with Condition 5.2.8d., that exceeds 110 percent of the highest hourly average operating load recorded in accordance with Condition 4.2.9b.iii.
[40 CFR 63.7540(a)(1) and 40 CFR 63.7540(b)]
 - viii. Any operation of the thermal oil heater system (ID No. TOHS) with an oxygen trim system set point below the lowest hourly average oxygen concentration measured during the most recent CO performance test.